

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

Petition of the Episcopal Diocese of Rhode
Island for Declaratory Judgment on
Transmission System Costs and Related
“Affected System Operator” Studies

Docket No. 4981

THE EPISCOPAL DIOCESE OF RHODE ISLAND
FIRST SET OF DATA REQUESTS
TO THE DIVISION OF PUBLIC UTILITIES AND CARRIERS

(EDRI 1-1 through EDRI 1-16)

- 1-1. Describe the discussion referenced in the first sentence of the email between Mathew Stern and Jon Hagopian dated November 12, 2019, including who participated, their place of employment, where it occurred, and what was discussed.
- 1-2. Please identify any other meetings or conversations that occurred between Matthew Stern, Jack Habib, Brooke Skulley or any other representative of Narragansett Electric Company d/b/a National Grid (the Company) and Jon Hagopian or any other representative of the Division of Public Utilities and Carriers (the Division) including who participated, their place of employment, where it occurred, and what was discussed.
- 1-3. Explain the process by which the Division reached the conclusion reflected in the email of November 13, 2019, from John Hagopian to Matthew Stern and in the comments it filed in this docket 4981, including any research done, meetings or conversations had and any other diligence.
- 1-4. Explain the similarities in the content of the Division’s comments filed in docket 4981 and the contents of Matthew Stern’s email dated November 12, 2019.
- 1-5. Is it the Division’s standard practice to ask the Company for advice on how to present its legal position regarding a legal issue presented to the Public Utilities Commission (Commission)?
- 1-6. Is it appropriate for a purportedly neutral regulatory agency to have its mental impressions shaped by one party to an adjudication in which it is meant to serve as the ratepayer advocate? If so, why?
- 1-7. On what basis did the Division conclude that its communications with its regulated for-profit utility could be considered attorney work product?
- 1-8. Explain the basis for the Division’s position that its “common interest” with the Company made it right and proper for the Division to confer in response to an energy policy issue put before the Commission?
- 1-9. Explain how such a claimed “common interest” is consistent with the Division’s charge to regulate the way electric utilities carry on their operations to assure an abundance of

energy supplied to the people with reliability, at economical cost, and with due regard for the preservation and enhancement of the environment. R.I. Gen. Laws §39-1-1(a).

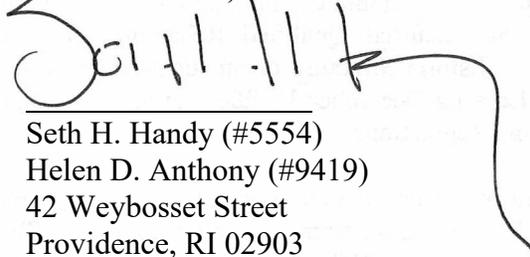
- 1-10. Explain how such an observed “common interest” provide for just and reasonable rates and charges without unjust discrimination, undue preferences or advantages, or unfair or destructive competitive practices.
- 1-11 Explain how such a perceived “common interest” ensures the Division’s due regard for the preservation and enhancement of the environment as our general assembly deemed necessary to protect the health and general welfare of Rhode Island citizens.
- 1-12 Explain how the Division could properly claim a common interest with a utility it is charged to regulate in a fair and non-discriminatory manner as to claims brought by a customer contesting the Company’s right to impose federal obligations on a renewable energy project interconnecting to Rhode Island’s distribution system under the Company’s distribution system interconnection tariff so that it could generate cheaper, cleaner and more secure renewable energy?
- 1-13 Did the Division consider whether the Company could have any economic interests that might influence its advocacy on the issue presented to the Commission in this docket 4981?
- 1-14 What economic interests might have influenced the Company’s advocacy on the issue presented to the Commission in this docket 4981?
- 1-15 How are the Company’s interests that might influence its advocacy on the issue presented to the Commission in this docket 4981 consistent with assuring an abundance of energy supplied to the people with reliability, at economical cost, and with due regard for the preservation and enhancement of the environment?
- 1-16 Did the Division consider whether the Episcopal Diocese of Rhode Island (EDRI) could have interests that might influence its advocacy on the issue presented to the Commission in this docket 4981?
- 1-14 What economic interests might have influenced EDRI’s advocacy on the issue presented to the Commission in this docket 4981?
- 1-15 How are EDRI’s interests that might influence its advocacy on the issue presented to the Commission in this docket 4981 consistent with assuring an abundance of energy supplied to the people with reliability, at economical cost, and with due regard for the preservation and enhancement of the environment?
- 1-16 If the Division concluded that the Company’s interests were better aligned with assuring an abundance of energy supplied to the people with reliability, at economical cost, and with due regard for the preservation and enhancement of the environment than were EDRI’s

interests, explain any reasons for that conclusion.

**THE EPISCOPAL DIOCESE OF
RHODE ISLAND**

By its attorneys,

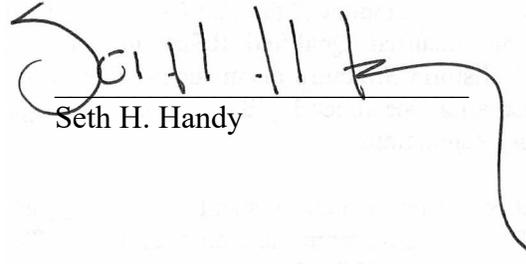
HANDY LAW, LLC

A handwritten signature in black ink, appearing to read 'Seth H. Handy', is written over a horizontal line. A long, curved line extends from the end of the signature to the right.

Seth H. Handy (#5554)
Helen D. Anthony (#9419)
42 Weybosset Street
Providence, RI 02903
(401) 626-4839

CERTIFICATE OF SERVICE

I hereby certify that on April 13, 2021, I delivered a true copy of the foregoing document to the service list by electronic mail.

A handwritten signature in black ink, appearing to read 'Seth H. Handy', is written over a horizontal line. A long, curved line extends from the end of the signature to the right.

Seth H. Handy